

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	No.17-00270-01-cr-w-DGK
)	
DONNIE BRETT BUTCHER,)	
)	
Defendant.)	

MOTION FOR ORDER PERMITTING TRAVEL

COMES NOW the Defendant Donnie Brett Butcher, by counsel, and moves the Court for an order allowing him to travel on business from his residence in Kansas City, Missouri, to two locations in Italy, from March 12, 2018, through March 18, 2018. Mr. Butcher states the following in support of this motion:

SUGGESTIONS IN SUPPORT

1. In August, 2017, Mr. Butcher was charged by indictment with two counts of attempted distribution of child pornography over the internet, in violation of 18 U.S.C. §2252(a)(2), and possession of child pornography, in violation of 18 U.S.C. § 2252(a)(4). The case is currently set for trial on the May, 2018 joint criminal jury trial docket.

2. Mr. Butcher was placed on bond. Early during Mr. Butcher's supervision, there was a violation report filed relating to a positive sweat patch for methamphetamine. Mr. Butcher was continued on bond, and has had no further violations. Mr. Butcher

remains employed, and has been compliant with all other pretrial release conditions.

3. Mr. Butcher is a key employee at his company, Hair-U-Wear, which requires his presence at significant distributor meetings and trade shows occurring in Rome, Italy and Bologna, Italy between March 12, 2018, and March 18, 2018.

4. Mr. Butcher would depart from Kansas City International Airport on March 12, 2018 for Rome, Italy, arriving in Rome on March 13, 2018. Traveling with him will be other employees of Hair-U-Wear. On March 14, he will attend a company dinner in Rome, Italy, and on March 15th, there will be a distributor meeting, also in Rome. The group will then travel to Bologna, Italy for the Cosmoprof International Beauty Show, followed by a convention the next day. Mr. Butcher will then depart Bologna, Italy to return to Kansas City on March 18, 2018. Mr. Butcher has agreed to provide pretrial services and the undersigned counsel confirmation of his flight arrangements and residential accommodations in Italy.

5. Mr. Butcher will certainly comply with any additional conditions Pretrial Services might impose while away from the greater Kansas City area.

6. Mr. Butcher has appeared in-person at all court appearances. It is notable that although Mr. Butcher has been aware of the investigation leading to this indictment since March, 2017, when

a search warrant was executed at his home, he traveled out of the country during that time, and always returned. He has been responsive to counsel, the Court, and to Pretrial Services, and there is no reason to believe he is a flight risk.

WHEREFORE, Mr. Butcher respectfully requests this Court for an Order allowing order allowing him to travel from his residence in Kansas City, Missouri, to Rome and Bologna, Italy, between March 12 and March 18, 2018.

Respectfully submitted:

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of February, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system for electronic delivery to all counsel of record.

/s/ J. Justin Johnston
Attorney for Defendant